

EXHIBIT G



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**Re: *White, et al. v. Samsung Electronics America, Inc., et al.* Case
No. 17-1775 (MCA)(JSA)
Samsung Smart TV Inspection Protocol**

Counsel:

In accordance with the Inspection Notices previously served on Plaintiffs, and our letter of August 31, 2023, we write to provide you with an Inspection Protocol generally outlining the actions intended to be taken with Plaintiffs' Smart TVs during the anticipated inspections.

PRODUCT INSPECTION PROTOCOL

Location and Available Connectivity

- In advance of the inspections, Plaintiffs shall identify the location of each of the Samsung Smart TVs identified below.
- In advance of the inspections, Plaintiffs shall confirm that all of the identified Samsung Smart TVs will be produced for inspection in the same condition as Plaintiffs' normal use of the Samsung Smart TVs as far as connections to power, internet, wifi and any other devices.

Samsung Smart TVs

The following five (5)¹ Samsung Smart TVs, as described in our August 24, 2023 letter, shall be inspected:

¹ We have removed Cauley Smart TV # 3 (as identified in our August 24, 2023 letter) based on your representation that this TV was purchased by Plaintiff Cauley as a gift and is not within Plaintiff's possession, custody and control.

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- Cauley Smart TV No. 1: Model No UN55KS8000FXZA (55" Class KS8000 4K SUHD TV), purchased January 29, 2017 in NJ and bearing serial no. 05JZ3CYH0948B.
- Cauley Smart TV No. 2: Model No UN65TU7000FXZA (65" Class Crystal UHD TU7000), and bearing serial no. 09M63CETC04928P, purchased at unspecified location and unspecified date in 2022.
- Cauley Smart TV No. 3: Samsung 40" Class – LED - 5 Series - 1080p -Smart HDTV.”
- White Smart TV No. 1: Model No UN55KU6300F (55" KU6300F Flat Smart 4K UHD TV) serial no. 05HX3CAHB11790N.
- White Smart TV No. 2: Model No UN3255500AFZA (32" Full HD Flat TV J5003 Series 5) serial no. 03NL3CGG905093M.
- White Smart TV No. 3: Model No QN75Q8FNB (75" 2018 Q8F 4K Smart QLED TV) serial no. 07AS3CAM200366D.

Inspection Details

For each Samsung Smart TV, a representative of Samsung Electronics America (“SEA”) shall examine and operate the Samsung Smart TV, access its settings, customer menu and/or service menu, and make sufficient observations in order to:

1. Verify Model No and Serial No.;
2. Assess the physical condition of the Smart TV;
3. Identify any devices connected to the Smart TV;
4. Determine whether the Smart TV operates and is connected to internet;
5. Test whether the Smart TV is connected to Smart Hub;
6. Identify any apps installed on the Smart TV;
7. Identify Smart TVs’ Device Unique Identifier (DUID), Unique Device Identifier (UDID) and/or Personalized Service Identifier (PSID)²;

We reserve the right to inspect Smart TV # 3 if it is later determined to be within Plaintiff’s possession, custody and control.

² SEA requested this information in Interrogatories served on May 22, 2023 and in follow-up communications, including correspondence dated August 24 and August 31, 2023.

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8. Determine whether the user consented to Samsung's Smart Hub Terms and Conditions by date, and the version of the Smart Hub Terms and Conditions to which user consented;
9. Determine whether the user consented to Samsung's Privacy Policy and the version of Samsung's Privacy Policy to which user consented;
10. Determine whether the user consented to viewing information services and/or viewing history services and the version of the viewing information services/viewing history notice to which user consented;
11. Determine whether the user consented to Samsung's Interest-Based Advertisement Services, and the version of the interest-based advertising notice to which user consented;
12. Identify the Smart TV's selected or designated location or region setting.

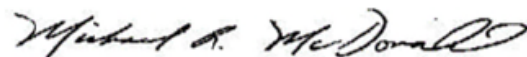
SEA's representative may take notes and photographs and/or videos of the Smart TVs.

* * * * *

Given the Product Inspection Protocol disclosed above, kindly advise whether Plaintiffs withdraw their objections to the Inspection Notices and will permit inspections on mutually agreeable dates.

We look forward to you confirming dates and locations for the inspections.

Very truly yours,



Michael R. McDonald

MRM/mmm

cc: All Counsel of Record